

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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OTTERBOURG PC Melanie L. Cyganowski, Esq. Jennifer S. Feeney, Esq. Michael R. Maizel, Esq. mcyganowski@otterbourg.com jfeeney@otterbourg.com mmaizel@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>	MASSEY & GAIL LLP Jonathan S. Massey, Esq. Rachel S. Morse, Esq. jmassey@masseygail.com rmorse@masseygail.com 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>
In re: LTL MANAGEMENT, LLC, ¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**APPLICATION FOR RETENTION OF THE HONORABLE ROYAL FURGESON (RET.) AS
EXPERT WITNESS FOR THE OFFICIAL COMMITTEE OF TALC CLAIMANTS EFFECTIVE
MAY 19, 2023**

1. The applicant, Official Committee of Talc Claimants (the “Committee”) of LTL Management LLC (the “Debtor”), is the (check all that apply):

☐ Trustee: ☐ Chap. 7 ☐ Chap. 11 ☐ Chap. 13.

☐ Debtor: ☐ Chap. 11 ☐ Chap. 13

☒ **Official Committee of Talc Claimants**

2. The applicant seeks to retain the following expert **Honorable Royal Furgeson (Ret.)** to serve as (check all that apply):

☐ Attorney for: ☐ Trustee ☐ Debtor-in-Possession

☐ Official Committee of _____

☐ Accountant for: ☐ Trustee ☐ Debtor-in-possession

☐ Official Committee of _____

☒ **Other Professional:**

☐ Realtor ☐ Appraiser ☐ Special Counsel

☐ Auctioneer ☒ Other (specify): **Expert witness and consultant on multi-district process**

3. The employment of the professional is necessary because the Committee requires consulting and expert witness services regarding the multi-district process’s tools and ability to resolution of claims and maintenance of Constitutional jury trial rights.

4. The professional has been selected because Honorable Royal Furgeson (Ret.) has five (5) years of experience with the multi-district process and can provide the necessary consulting and expert witness services required by the Committee.

5. The professional services to be rendered are as follows: Honorable Royal Furgeson (Ret.) will be engaged as a consultant, but at the Committee's request, will serve as an expert witness and prepare an expert report.
6. The proposed arrangement for compensation is as follows: Honorable Royal Furgeson (Ret.) agrees to be compensated at the rate of \$1,000 per hour for all time he reasonably expends in connection with the work he performs, including travel time. Honorable Royal Furgeson (Ret.) agrees to be compensated for all time reasonably expended without regard to the opinions expressed and without regard to the outcome of this matter. Honorable Royal Furgeson (Ret.) agrees to be compensated for any reasonable out-of-pocket expenses that he may incur in connection with this engagement. Honorable Royal Furgeson (Ret.) agrees to be compensated out of the Debtor's bankruptcy estate only upon the entry of any fee order issued by the Court resulting from periodic fee applications, and on any appropriate fee statements filed consistent with any case orders providing for the periodic payment of professionals.

Honorable Royal Furgeson (Ret.) agrees that he will only seek reimbursement of expenses in accordance with sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, the U.S. Trustee Guidelines established by the Office of the United States Trustee, any interim compensation orders, and any other applicable orders of this Court.

7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection: See Honorable Royal Furgeson's (Ret.) Certification.

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☒ does not represent an adverse interest to the estate.

☒ is a disinterested person under 11 U.S.C. § 101(14).

☒ does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☐ Describe connection:

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: N/A

10. The Committee respectfully requests authorization to employ Honorable Royal Furgeson (Ret.), as expert witness, to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

Dated: June 7, 2023

Respectfully Submitted,

THE OFFICIAL COMMITTEE OF TALC CLAIMANTS

/s/ Michelle Parfitt

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